

March 7, 2023

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Catherine McKoy, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS) (SLC)

Dear Judge Cave:

We write jointly pursuant to the Court's February 16, 2023 Order, ECF 514 ¶ 5, to report on the status of scheduling expert witness depositions and the deposition of ACN Opportunity, LLC ("ACN") executive Robert Stevanovski.

Expert Depositions. All three of Plaintiffs' expert witnesses have been deposed. Following the Court's February 16 Order, the parties met and conferred regarding the deposition of Defendants' four expert witnesses and have agreed to the following schedule:

- Deposition of Mr. Mark Crandon – March 10, 2023,
- Deposition of Dr. Isabella Cunningham – March 13, 2023,
- Deposition of Dr. Robert Peterson – March 14, 2023,
- Deposition of Dr. Joseph Hair – March 20, 2023.

Stevanovski Deposition. The parties had expected that Mr. Stevanovski's deposition would take place tomorrow, March 8, as previously agreed to by ACN's counsel. On March 3, counsel for ACN notified Plaintiffs of a potential scheduling conflict and requested that Mr. Stevanovski's deposition be rescheduled to March 17, to which Plaintiffs consented.

The parties are available to address any questions the Court may have regarding the above.

Respectfully submitted,

/s/ John C. Quinn

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